Leigh (U.S. Patent No. 1,351,480) in view of Fisher et al. (U.S. Patent No.6,568,011) and Yuen et al.(U.S. Patent No.3,772,717). Applicant respectfully traverses these rejections.

As concerns claim 1, first, the Examiner agrees that Leigh fails to teach the separators being I-beam and Marshall discloses a mattress comprising an outer shell having a plurality of built-in internal parallel I-beam separators; second, the Examiner agrees that Leigh fails to teach zippers installed on the conduit-sides of the outer shell, but find the feature in Henley et al.; third, the Examiner agrees that Leigh fails to disclose the inflatable longitudinal inner chamber having an air outlet, but Fisher discloses an air inlet and an air outlet.

As concerns claim 2, first, the Examiner agrees that Leigh fails to teach having an air inlet and an air outlet but Fischer teaches having an air inlet and an air outlet at the same end of the air chamber; second, Leigh fails to teach using PVC-like material but Yuen et al. did. The Examiner concludes that all unique features are obvious based on these prior art.

The standard for obviousness is described in a recent case, In re Dance, 48 USPQ2d 1635 (CAFC 1998), as follows.

> To establish a *prima facie* case of obviousness based on a combination of the content of various references, there must be some teaching, suggestion or motivation in the prior art to make the specific combination that was made by the applicant. *In re Raynes*, 7 F.3d 1037, 1039, 28 USPQ2d 1630, 1631 (Fed. Cir. 1993); *In re Oetiker*, 977 F.2d 1443, 1445, 24 USPQ2d 1443, 1445 (Fed. Cir. 1992). **Obviousness can not be established by hindsight combination to produce the claimed invention**. *In re Gorman*, 933 F.2d 982, 986, 18 USPQ2d 1885, 1888 (Fed. Cir. 1991). As discussed in *Interconnect Planning Corp. v. Feil*, 774 F.2d 1132, 1143, 227 USPQ 543, 551 (Fed. Cir. 1985), it is the prior art itself, and not the applicant's achievement, that must establish the obviousness of the combination. In re Dance, 48 USPQ2d 1635, 1637 (CAFC 1998).

Applicant respectfully submit that there is no teaching, suggestion or motivation within the prior art to combine the prior art as the combination of features recited in Applicant' claims.

As stated in MPEP §2143.01:

> The mere fact that references can be combined or modified do not render the resultant combination obvious unless the prior art also suggests the desirability of the combination. *In re Mills*, 916 F.2d 680, 16 USPQ2d 1430 (Fed. Cir. 1990)

As stated earlier, although the Examiner recognizes none of the cited prior alone discloses all limitations of this invention, and the Examiner combines several different features disclosed in 5 different issued patents together then renders that all limitations of this invention are obvious. However, by reviewed all cited prior art, Applicant find that not all of these combinations of this invention are suggested to be combined by these prior art. Therefore, claims 1-3 of this invention are not obvious.

If the Examiner believes that a further telephonic interview will facilitate allowance of the claims, he is respectfully requested to contact the undersigned at (610) 446-5886. For the reasons stated above, Applicant respectfully asserts that the pending claims are in condition for allowance. Reconsideration and allowance of the pending claims are respectfully requested.

Respectfully submitted,

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